

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LINDSAY LIEBERMAN,

Plaintiff,

-against-

C.A. GOLDBERG, PLLC &
CARRIE A. GOLDBERG,

Defendants.

C.A. GOLDBERG, PLLC,

Counterclaim Plaintiff,

-against-

LINDSAY LIEBERMAN,

Counterclaim Defendant.

Case No. 21-CV-05053-ENV-RER'

DECLARATION OF
ADAM MASSEY

STATE OF NEW YORK)

)

ss.:

COUNTY OF KINGS)

I, Adam Massey, declare, under penalties of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Partner of C.A. Goldberg, PLLC (“the Firm”).
2. Carla Cain-Walther’s statement that I “frequently speculated on Lindsay’s relationship and pregnancy status” with Carrie Goldberg is false. Declaration of Carla Cain-Walther ¶ 12 (hereafter ¶). I have no idea what Cain-Walther is referring to, and Goldberg certainly never made “insulting statements” about Lieberman “only wanting to be married and pregnant.” ¶ 4.
3. Cain-Walther states she could overhear Goldberg and I being “catty” because of the open office plan. ¶¶ 4-5. That is false. Goldberg had her own office, and starting in October 2017, I also had my own office. Goldberg did not gossip about current employees anywhere, let alone in the “open office” space.

4. Goldberg never asked me when I was planning on having a baby, let alone “on multiple occasions.” ¶ 5. As I said in my July 5, 2022 declaration, I was constantly bringing up the topic of pregnancy and my family planning to Goldberg.

5. My recollection is that when I texted that “[Goldberg] was dreading it happening,” I did not mean that Goldberg was dreading Lieberman being pregnant, and was referring to her concerns about two attorneys being on leave at the same time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2022

Adam Massey

Adam Massey